



E. EVANS WOHLFORTH, JR.

666 Third Avenue, 20th floor
New York, NY 10017-4132
Main (212) 451-2900
Fax (212) 451-2999
ewohlforth@rc.com
Direct (212) 451-2954

Admitted in New York
and New Jersey

October 26, 2023

Via ECF

Honorable Cathy L. Waldor, U.S.M.J.
United States District Court, District of New Jersey
United States Post Office & Courthouse
MLK Bldg. & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: *Johnson & Johnson Health Care Systems Inc. v. Save On SP, LLC* (Case No. 2:22-cv-02632-ES-CLW)

Your Honor:

We write in connection with the status conference in the above-captioned matter scheduled for Monday, October 30, 2023 at 1:30 p.m., and a letter¹ submitted today by Jeffrey J. Greenbaum, Esq., counsel for Johnson & Johnson Health Care Systems Inc. (“JJHCS”) regarding the same.

The applications before the Court are Save On SP, LLC’s (“SaveOnSP”) own requests for relief and, therefore, SaveOnSP asks that they be addressed in the following order, which we believe is preferable and more efficient:

1. SaveOnSP’s request regarding CAP search terms (ECF 166) (October 25, 2023)
2. SaveOnSP’s request that JJHCS produce documents regarding its terms and conditions and related benefits investigations. (ECF 146) (August 24, 2023)

¹ October 26, 2023 Letter from J. Greenbaum to the Hon. Cathy L. Waldor (“JJHCS Letter”).

Robinson+Cole

Hon. Cathy L. Waldor, U.S.M.J.

October 26, 2023

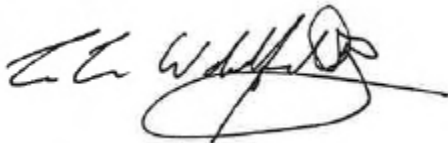
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3. SaveOnSP's request that JJHCS produce documents regarding its finances (ECF 150) (Sept. 7, 2023)
4. SaveOnSP's request regarding the sharing of documents with non-parties Express Scripts Inc. and Accredo Health Group (ECF 149) (Sept. 5, 2023)
5. SaveOnSP's request regarding JJHCS's interrogatory responses (ECF 162) (Oct. 11, 2023)
6. SaveOnSP's request for 12 additional custodians (ECF 165) (Oct. 25, 2022)

Mr. Greenbaum accurately recounts that SaveOnSP raised the possibility with JJHCS of coordinating to submit a joint agenda. I subsequently advised him, however, that, on further reflection, SaveOnSP would submit an agenda, because, as noted, each of the applications is SaveOnSP's.

We look forward to appearing before Your Honor at Monday's conference and we appreciate Your Honor's time and attention to this matter. Please do not hesitate to have chambers staff contact me with any questions or concerns, or if we may be of any service to the Court whatsoever.

Respectfully,

A handwritten signature in black ink, appearing to read "E. Evans Wohlforth, Jr.", with a large, stylized flourish at the end.

E. Evans Wohlforth, Jr.

cc: All counsel of record (by ECF)